IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

CENTRAL STATES, SOUTHEAST AND)
SOUTHWEST AREAS PENSION FUND; and HOWARD McDOUGALL, as Trustee,) Case No. 11 CV 2995
Plaintiffs, v.) Judge William J. Hibbler) Magistrate Judge Nolan)
MOORE JAGUAR/ASTON MARTIN, INC., a Missouri corporation,)))
Defendant.)

AGREED MOTION FOR ENTRY OF CONSENT JUDGMENT

Plaintiffs, the Central States, Southeast and Southwest Areas Pension Fund (the "Pension Fund") and Howard McDougall, one of its present Trustees, hereby move for entry of a consent judgment. In support thereof, Plaintiffs state:

- 1. On May 5, 2011, Plaintiffs filed this action in accordance with the provisions of the Employee Retirement Income Security Act of 1974 ("ERISA"), 29 U.S.C. §1001 *et seq.*, to recover monthly benefit contributions owed to the Pension Fund, in addition to accrued interest, liquidated damages and attorneys fees and costs.
- 2. The parties agree to the entry of the Consent Judgment attached hereto as <u>Exhibit</u> <u>A</u>, which has been signed by a representative of each of the parties.
- 3. On December 8, 2011, Plaintiffs' attorney consulted with, Nicholas Klumb one of the attorneys for Defendant, and he agreed to the filing of this Motion.

4. Therefore, Plaintiffs respectfully request the entry of the Consent Judgment attached hereto.

WHEREFORE, Plaintiffs respectfully request the Court to enter the proposed Consent Judgment.

Respectfully submitted,

/s/ Timothy C. Reuter

Timothy C. Reuter Attorney for Plaintiffs Central States, Southeast and Southwest Areas Pension Fund 9377 W. Higgins Road Rosemont, Illinois 60018-4938 (847)518-9800, Ext. 3481 ARDC No. 06279373 treuter@centralstatesfunds.org **CERTIFICATE OF SERVICE**

I, Timothy C. Reuter, one of the attorneys for the Central States, Southeast and

Southwest Areas Pension Fund and Howard McDougall, trustee, certify that on December

8, 2011, I caused the foregoing Agreed Motion for Entry of Consent Judgment to be filed

electronically. This filing was served on all parties indicated on the electronic filing receipt

via the Court's electronic filing system.

/s/ Timothy C. Reuter

Timothy C. Reuter

One of Central States' Attorneys